Transcript Of Public Hearing Testimony Draft Sand And Gravel General Permit Lacey, WA October 5, 2015

## Bruce Wishart - Puget Soundkeepers

"Thank you. For the record, Bruce Wishart 117 25th Ave SE Olympia. And I am here testifying on behalf of Puget Soundkeepers today, and we have some written comments and I am going to focus on two areas of concern. First, we were concerned to see that the draft permit eliminates both monitoring and effluent limits for nitrates in stormwater. DMRs that have been submitted over the last number of years have shown the exceedances for nitrates in stormwater, and while some nitrates originate offsite that does not relieve the permittee from the obligation to address the problem. Obviously the site alterations that will facilitate the infiltration of these if for no other reason, they should be addressed in the permit. Second, we thank you for including language on concrete recycling, which we do think is a significant problem but feel strongly that this section should be strengthened. I think we've seen 20 violations associated with these materials over the past 5 years in Washington State. A number of other states and federal agencies have conducted studies and have found that this material can cause very significant Ph violations, as high as 12. Appreciate the Section S9.F which identifies siting standards for concrete recycling piles but are very concerned to discover that there are no new requirements for existing piles. The permit needs to have, at a minimum, stronger monitoring provisions for these piles, and Appendix C should also be strengthened to ensure that we address any problems that are discovered in a timely manner. And I'll stop there. Again, we have written comments with more detail. Thank you for the opportunity to speak."